#### Pre October 2014

## **EPA Order 3500.1 Inspector Training Requirements OECA CAA Stationary Sources** Inspector Training Course(s), Self-Study, and OJT Completion Certification Form

Employee Name: Francisco Claudio

Mandatory Training Requirement	Date Completed
40-HR Health and Safety Course	Nov 17, 1989
Basic Inspector Training (BIT)  See Exemption Hemo	Jan 11, 1966
	Sept 9, 2014
Visible Emissions Training (Required for inspectors conducting opacity readings)	May 2012 Nour ben 9,20 // nr iba
Mandatory Self-Study Requirement	Date Completed
40 CFR §§ 50.1-12: National Primary & Secondary Ambient Air Quality Standards	Oct 29, 2009
40 CFR §§ 51.100-232: Requirements for Preparation	Oct 29, 2009
40 CFR §§ 52.1-34 Approval and Promulgation	Oct 29, 2009
40 CFR §§ 60.1-19 Standards of Performance for New Sources	Oct 29, 2009
40 CFR §§ 63.1-16 National Emission Standards	Oct 29, 2009
§§ 51.166 & 52.21 Prevention of Significant Deterioration of Air Quality	Oct 29, 2009
40 CFR § 51.165: Permit Requirements	Oct 29, 2009

Effective Date: PRE OCTOBER 2014

**OECA** 

Mandatory Self-Study Requirement .	Date Completed
CAA Compliance Monitoring Strategy (2009	Oct 29, 2009
CAA CBI, Information Security Manual (EPA 450-B-03-001)	Oct 29, 2009 Sylember 11, 2014 192
National Stack Testing Guidance	Oct 29, 2009
Air Pollution Control Technology (CD-ROM)	Oct 29, 2009
Review two completed program inspection reports for each type of CAA source inspection to be conducted.	Oct 29, 2009
Mandatory OJT Requirement	Date Completed
Participate in two compliance evaluations with a senior lead inspector.	1980-1985
Annual Refresher Training	Date Completed
3500.1 On-the-Job Training	
(FY /3) -8-HR Health and Safety Refresher	Oct. 12, 2012
*3500.1 CAA Mandatory Refresher Training (annually)	
-8-HR Health and Safety Refresher	Jan 15, 2014

Inspector Certification:

I, \_\_Francisco Claudio, certify that I completed the above mandatory 2004 training requirements referenced in the December 23, 2002 EPA Order 3500.1.

Inspector Signature:

Date:

Francisco choudio

#### First Line Supervisor/or Designee Certification:

i, Carce Dedrigue, certify that the above-named inspector completed the above
mandatory 2004 training requirements referenced in the December 23, 2002 EPA Order 3500.1, and that the
inspector is qualified to conduct quality compliance inspections/field investigations and/or collect compliance
samples on behalf of the agency.

ECHAPTY Date: 1/24/2016

Effective Date: PRE OCTOBER 2014



Government of Puerto Rico
Environmental Quality Board
Air Quality Area
Visible Emissions Evaluation School

## THIS CERTIFIES THAT

# Francisco Claudio Ros

Has successfully completed the Visible Emissions Evaluation Recertification Test and results are in accordance with Method 9, 40 CFR 60 Appendix A

Maximum Deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeded 15% opacity. This certificate is valid for six months from the date of issuance.

Mr. Victor Vazquez

May 30, 1997 Date of Issuance Eng. Eduardo Del Río Pérez Air Quality Acting Director

## U.S. ENVIRONMENTAL PROTECTION **AGENCY**

This certifies that FRANCISCO CLAUDIO RIOS

HAZARDOUS MATERIALS IN OPERATIONS (165.5)

OFFICE OF EMERGENCY AND REMEDIAL RESPONSE

Course Difector

Training Coordinator, Environmental Response Branch

### U.S. ENVIRONMENTAL PROTECTION AGENCY

This certifies that

### Francisco Claudio Rios

has completed

# HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (HAZWOPER) EIGHT-HOUR TRAINING

Puerto Rico October 24, 2012

0.6 Continuing Education Units

This course meets the 29 CFR 1910.120(e)(8) requirement of 8 hours of refresher training for hazardous waste site workers.

Presented by the

**ENVIRONMENTAL RESPONSE TRAINING PROGRAM** 

Course Director

U.S. FPA Project Officer

### U.S. ENVIRONMENTAL PROTECTION AGENCY

This certifies that

### Francisco Claudio

has completed

# HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (HAZWOPER) EIGHT-HOUR TRAINING

San Juan, PR January 15, 2014

0.6 Continuing Education Units

This course meets the 29 CFR 1910.120(e)(8) requirement of 8 hours of refresher training for hazardous waste site workers.

Presented by the

**ENVIRONMENTAL RESPONSE TRAINING PROGRAM** 

Course Director

U.S. EPA Project Office

#### Memo

To:

File

From:

Francisco Claudio

Re:

Request for Exception from Basic Inspector Curriculum

I, Francisco Claudio, certify that from 1980 to 1997 I took several mandatory trainings as a requirement to become a qualified air inspector at the Puerto Rico Environmental Quality Board. Please see Attachment 1 for the description of the mandatory training taken as well as a summary of my involvement in various aspects of air enforcement at the state level with the different stages of responsibilities and complexity clearly delineated including but not limited to fuel sampling, stack tests oversight, and air inspection cases. Additionally, there is a description of the state and federal regulatory and programmatic activities lead by me which validate my training skills, my technical experience and my expertise in the development of programmatic state implementation plans (SIP) such as the PM10 SIP for Guaynabo and the Puerto Rico Title V Permit Program, among others. If I had been with EPA in the 1980's I would have been exempted from taking the Basic Inspector Training based on my experience as I would have met the following criteria for exception:

- (1) An employee hired prior to June 29, 1988;
- (2) An employee who clearly was a qualified inspector;
- (3) The benefits to the employee of the basic course were marginal;
- (4) The employee had completed 12 inspections in the three years preceding the exception request; and
- (5) The employee was involved in enforcement action(s) resulting from the inspections.

Once hired by the USEPA, the Agency reviewed and confirmed that the trainings taken were sufficient and the curriculum plus my experience met the requirements of the Basic Inspector training even though no formal written exception memo was in my files. Moreover, while I have been at EPA, I have further demonstrated my competency in the principles taught in this course by the fact that I have conducted over five hundreds air inspections on chemical and pharmaceutical plants, cement plants, refineries, gasoline distribution plants, dry cleaners, Non-Metallic Mineral Plants, etc. In addition, I have written over five hundred inspection reports and have issued hundreds of enforcement actions. During my field inspections, I have also overseen sampling events performed by permittees. Additionally, I have testified in state and federal court on numerous occasions in civil and criminal proceedings. In 2014, I took the Basic Inspector Training online (certificate attached) but am requesting this exemption to be able to certify completion of mandatory training requirements for a Clean Air Act Stationary Source inspector prior to 2014.

Signature of Inspector

	o has demonstrated competency in the principles tadgit in
the basic inspector training course and recommer	nd that this exception be granted
Dog Rolly	7/00/2016
Signature of First-Line Supervisor	Date
I, Carmen R. Guerrero-Perez, certify that Francis taught in the basic inspector training course and a	sco Claudio has demonstrated competency in the principles approve of this exception
Signature of Division Director	Date
Attachment 1	

# Attachment No. 1 Experience and Training History

Francisco Claudio Ríos Environmental Engineer S.S.-XXX-XX-6236

Mr. Francisco Claudio Ríos was hired as an Environmental Engineer in March 16, 1977 at the Puerto Rico Environmental Quality Board under the Air Quality Area. As an engineer, he was immediately trained in all aspects of regulations and assigned to Eng. Edgardo Sotto, Senior Engineer and Permit Division Chief. During the first two years he participated in several inspections led by senior engineers, environmental specialists and senior environmental technicians. Such inspections included domestic incinerators at condominiums, paint shops, wood furniture shops, quarries and sand and gravel activities. Such inspections were focused on their compliance status, control equipment performance and efficiencies and the use of alternate control measures directed to reduce and control pollution. Also, Mr. Claudio was directly involved in the evaluation of the permit applications and the development of air pollution control permits.

At this stage, he participated in the following courses or seminars:

- 1- Air Pollution Control Technology Course 431 January 11, 1980 3 CEU
- 2- Prevention of Significant Deterioration -Air Quality Permit Review February 9-11, 1981
- 3- Prevention of Significant Deterioration-Air Quality Control Techniques Sept. 9-10, 1981

In 1982, recognized for his skills, preparation, leadership and disposition, Mr. Claudio was assigned as Team Leader of the Fuel Sampling Section. This group was composed of two junior specialist which were involved in the sampling of all emission sources that use combustion equipment with a capacity greater that 8 MM Btu/hr of heat input and were required by PR RCAP Rule 410 to obtain a sulfur-in-fuel assignment. The Air Program had been using such unit to monitor the stationary sources that burn fossil and/or gas fuel. At that time the Program had assigned sulfur limits to 160 sources around the island. Such intensive task required the team to schedule the sources twice per year. After two(2) years, Mr. Claudio and his team were also assigned to observe the stack tests of those stationary sources required to evaluate units involved in construction permits and/or were required to demonstrate their efficiencies. In addition to initially observing the tests, Mr. Claudio was involved in the different phases of the tests such as evaluating methodologies, protocols, certifications, on-site equipment and facilities and final evaluation of the test reports.

He performed two Method 5 stack tests for two new NSPS asphalt plants. His training involved the following:

# 1- Compliance Test Observation and Evaluation Procedures Edison, NJ May 11, 1982 1.2CEU

Although he had several duties assigned, Mr. Claudio was also involved in the Inspection Group dealing with all minor and major sources, specially, those sources located in the southern part of the island. Among those were two refineries, two petrochemical complexes, two chemical industries, a power plant and several asphalt plants, quarries and sand and gravel activities. During his work, Mr. Claudio was also trained in the use of the CDS-Compliance Designated Sources Tracking System used by EPA to track the compliance status of major sources in Puerto Rico.

In 1984, Mr. Claudio was promoted to Section Chief of the Air Planning Division. This office had assigned approximately five(5) staff personnel including the secretary. The Office was directly involved in the evaluation of all Environmental Impact Statements, Stack Testings, Fuel Samplings and construction permits. Also, the office was required to assist the Director's Office to offer the Visual Emissions Evaluations Certification Courses to EQB-Air personnel. Also, as part of the training activities, the office was involved in the certification of Odor Evaluators for the performance of Odor Panels when complaints were received.

Although Mr. Claudio was Head of this Office, he continued to perform inspections to more complex sources and was part of the engineers who quarterly accompanied EPA-CFO and NY inspectors such as Casto Velazquez, Paul Rivera and Mr. Steven Riva. These officials performed joint inspections and audits and also offered their expertise to EQB personnel in the compliance and enforcement process.

In 1985, Mr. Claudio was assigned to assist the Urban Development Office, the Puerto General Service Administration, the Department of Education and the Health Department to evaluate the renovation of specific housing projects and schools that were identified by federal regulations to have asbestos containing material. As part of the evaluation, the Air Program was promoting procedures to perform the removal of material and established permit and safety requirements to the Education Department. Such permit requirements were shared with the OSHA Office, since several safety complaints were received due to the procedures used by government employees during the renovation of the schools facilities. To perform these duties, Mr. Claudio was trained in the following courses and workshops:

# 1- Asbestos NESHAPS Demolition and Renovations Inspections Procedures and Safety Workshops New York April 1985

- 2- Direct Reading Instruments for Air Surveillance (165.14)
  June 18-19 1985 San Juan
- 3- Respiratory Equipment Seminar Oct. 9, 1985

Also during 1985, Mr. Claudio was assigned to an Special Task Team to investigate a series of alleged toxic gas incidents in an industrial complex located at the Guanajibo Industrial Park in Mayaguez. Such complex involved a pharmaceutical plant and numerous small stationary sources including a wastewater treatment plant and various clothing manufacturing companies. The alleged toxic air releases occurred in the mornings and affected workers at random plants. The investigation lasted over three years of intensive sampling and the involvement of all state government agencies, EPA's scientist and ATDSR personnel

In 1986, Mr. Claudio was assigned as Head of the Permits and Engineering Division dealing directly with all major sources. This office is responsible for the evaluation of Major Environmental Impact Statements, Location Approvals and Construction Permits for major sources similar in the complexity to the PSD permit process. Also, the office was involved in those controversial cases involving the location approvals for hazardous waste incinerators, chemical plants involving highly toxic compounds such as methyl isocyanide and even herbicides manufacturing companies such as Monsanto and Dupont Agrichemicals. renowned Bophal toxic release in India, Dupont Agrichemicals proposed construction of a herbicide manufacturing company involving the use of methyl isocyanide and was immediately challenged by the surrounding communities. Since this project was so controversial, Mr. Claudio asked the Chemical Engineering Department of the University of Puerto Rico and the Engineers's Association to evaluate independently the project. Mr. Claudio visited West Virginia to inspect a similar manufacturing facility involving the use of such compound. The plant in West Virginia also manufactured phosgene which was prohibited in Puerto Rico. Mr. Claudio was assigned to the evaluation of this project and developed a one year temporary permit for a small scale plant during which the performance of the plant was evaluated. Simultaneously, the University of Puerto Rico and Engineers's Association, as independent entities, recommended the construction of the herbicide plant assuring that their control and safety measures were enough to eliminate any release of their chemical compounds even though the compounds were not similar to the India Chemical Plant.

The Division also supervised stack tests at different plants including those performed by EQB's technical personnel and assisted EPA in the evaluation of sulfur compounds test methods proposed by EPA at Research Triangle Park for power plants. The office had five engineers, one environmental specialist and highly trained technicians. Among the activities that were related to major sources, Mr. Claudio was assigned by the Director as the contact to keep track of sources thru CDS, identification of asbestos NESHAPS sources and the implementation of data for tracking sources with Continuous Emission Monitors (CEM's). Due to his involvement with high risk sources, Mr. Claudio took the following courses or seminars:

- 1- **Personnel Protection and Safety (165.2)** March 10-14, 1986 San Juan 2.6 CEU
- 2- Sampling for Hazardous Material (165.9) April 8-10, 1986 San Juan 2.0 CEU
- 3- Prevention of Significant Deterioration (PSD) San Juan August 5-7, 1986
- 4- Introduction to Air Toxics
  Course 400 APTI March 31, 1989 2CEU

In 1989, after the former Air Director's resignation, Mr. Claudio was promoted to Air Program Director, supervising ten(10) Section Chiefs and over 70 staff personnel.

In 1990, due to the Clean Air Act amendments, Mr. Claudio was involved in the development of a PM10 State Implementation Plan for the Guaynabo Municipality, the development of the Small Business Assistance Program Implementation Plan, and finally, the most challenging task, the development of the Puerto Rico Title V Operating Permit Program. These clearly required the participation in meetings with the Industrial Manufacturers Association, Governor's Office, the Legislature, the Office of Management and Budget (OMB), the Treasury Department, the Highway Authority, Ports Authority and many other entities affected by the newly promulgated rules and the required enforcement and regulatory activities proposed by the Air Program to comply with the 1990 CAA Amendments. During the performance of such task, Mr. Claudio also participated in several seminars, workshops, offered speeches on those matters and assisted the Chairman's Office in the outreach to all government and non-governmental groups. He attended the following training courses:

- 1- Hazardous Materials Incident Response Operations (165.5)
  Cincinnati, Ohio Nov.13-17,1989 2.1CEU
- 2- **Title V Operating Permit Procedures**North Carolina May 1991
- 3- Title V Operating Permit and Title III Workshop North Carolina June 1993
- 4- Enhanced Monitoring and Compliance Certification Oct. 11-12, 1994 New Jersey, NJ
- 5- Continuous Emission Monitoring (CEM's)
  Course 474 Sept. 12-15, 1995 3 CEU
  In summary, Mr. Claudio has performed over 800 inspections to all kinds of emission sources in

Puerto Rico. He has participated in over 500 fuel samplings and has overseen over 200 stack tests on different pollutants. He also performed two(2) stack tests at two asphalt plants and assisted Eng. Edgardo Sotto in a stack test in a refinery. He completed over 100 VE's certifications and participated in several Odor Panels which were used in several state enforcement cases. He assisted EPA personnel in training and seminars at EQB. He has trained other environmental technicians on these matters.

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# CERTIFICATE OF COMPLETION

This certificate of the National Enforcement Training Institute has been awarded to

# Francisco Claudio

For Successful Completion of

**Basic Inspector Training** 

Date Completed:

Ç

September

2014

Michael J. Walker, Acting Director National Enforcement Training Institute U.S. Environmental Protection Agency

1200 Pennsylvania Avenue NW Washington, DC 20460



#### Memo

To:

File

From:

Francisco Claudio

Re:

Certification of Mandatory Self-Study/Review for Inspector Credentials

I, Francisco Claudio, certify that I have read and/or familiarized myself with the following mandatory self-study materials for Clean Air Act: <u>Stationary Sources Inspectors</u> no later than the year(s) listed below:

Self-Certification of Mandatory Training EPA Order 3500.1		
Clean Air Act: Stationary Sources Inspectors Courses	Date taken	
3500.1 40 CFR §§ 50.1-12: National Primary & Secondary Ambient Air Quality Standards	Oct 29, 2009	
3500.1 40 CFR §§ 51.100-232: Requirements for Preparation	Oct 29, 2009	
3500.1 40 CFR §§ 52.1-34 Approval and Promulgation	Oct 29, 2009	
3500.1 40 CFR §§ 60.1-19 Standards of Performance for New	Oct 29, 2009	
Sources		
3500.1 40 CFR §§ 63.1-16 National Emission Standards	Oct 29, 2009	
3500.1 40 CFR §§ 51.166 & 52.21 Prevention of Significant	Oct 29, 2009	
Deterioration of Air Quality		
3500.1 40 CFR § 51.165: Permit Requirements	Oct 29, 2009	
CAA QA/QC Regional Plan (available in Regional Office)	Oct 29, 2009	
CAA Compliance Monitoring Strategy (2009)	Oct 29, 2009	
CAA CBI, Information Security Manual (EPA 450-B-03-001)	Oct 29, 2009	
National Stack Testing Guidance	Oct 29, 2009	
Air Pollution Control Technology (CD-ROM)	Oct 29, 2009	
Review completed program inspection reports.	Oct 29, 2009	

Signature of Inspector

Date

Signature of First-Line Supervisor

#### Memo

To: Teresita Rodriguez, Chief
Multimedia Permits and Compliance Branch

Re: Certification of Mandatory Self-Study/Review for Inspector Credentials

I, Francisco Claudio Rios, certify that I read or review over the past 12 years the following mandatory self-study/review requirements for Clean Air Act (CAA) Stationary Sources inspectors:

Statutes/Regulations

- 40 CFR §§ 50.1-12: National Primary and Secondary Ambient Air Quality Standards
- 40 CFR §§ 51.100-232: Requirements for Preparation, Adoption, and Submittal of Implementation Plans
- 40 CFR §§ 52.1-34: Approval and Promulgation of Implementation Plans-General Provisions
- 40 CFR §§ 60.1-19: Standards of Performance for New Stationary Sources-General Provisions
- 40 CFR §§ 63.1-16: National Emission Standards for Hazardous Air Pollutants for Source Categories - General Provisions
- 40 CFR §§ 51.166 and 52.21: Prevention of Significant Deterioration of Air Quality
- 40 CFR § 51.165: Permit Requirements

#### Guidance/Reference Materials

- CM Compliance Monitoring Strategy (2001)\*
- CAA Confidential Business Information, Information Security Manual (EPA 450-B-03-001)\*
- National Stack Testing Guidance\*
- Air Pollution Control Technology (CD-Rom)\*
- Review of a minimum of two completed inspection reports for each type of CAA stationary source inspection to be conducted. (\*Source: Greg Fried, 202-564-7016)

### Recommended Training (Air Regulations)

- Introduction to Hazardous Air Pollutants (APTI 400)\*,......
- Principles and Practices of Air Pollution Control (APTI 452)\*
- Analytical Methods for Air Quality Standards (APTI 464)\*
- MACT Training (LADCO)\* (\*Source: Greg Fried, 202-564-7016)

Recommended Training (Volatile Organics - VOC's)

- Sources and Control of Volatile Organics (APTI 482)\*
- Baseline Source Inspection (APTI 445)\*
- Source Sampling for Pollutants (APT I 450)\*
- Atmospheric Sampling (APTI 435)\*
- Preparation of Emission Inventories (APTI 419)\*

## Recommended Training (Particulate Emissions)

- Control of Particulate Emissions (APTI 413)\*
- Gaseous and Particulate Matter Monitoring (WESTAR)\*
- Inspection of Particulate Control Devices (CENSARA)\*
- Continuous Emissions Monitoring (APTI 474)\* (\*Source: Greg Fried, 202-564-7016)

## Recommended Training (Combustion Sources)

- Combustion Evaluation (APTI 427)\*
- Combustion Source Inspection (RUTGERS)\*
- · Control of Gaseous Emissions (APTI 415)\*
- · Control of Nitrogen Oxide Emissions (UTA)\*

## Recommended Self-Study/Review (Air Regulations)

- · Introduction to Air Pollution Control,
- Standards of Performance for New Stationary Sources (40 CFR §§ 60.20-to end)

Individual Subparts, as needed. National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR §§

63.40-to end) - Individual Subparts, as needed. The Plain English Guide to the Clean Air Act (4/93) (EPA 400-K-93-001)\* The New Clean Air Act: What it Means to You (Jan/Feb 1991)\*

Taking Toxics Out of the Air: Progress in Setting "Maximum Achievable Control Technology" Standards Under the Clean Air Act (August 2000)\*

Clean Air Act Civil Penalty Policy\*

How to Review and Issue Clean Air Act Applicability Determinations and Alternative Monitoring: NSPS, NESHAP (EPA 305-B-99-004, 2/99)\*

Guidelines for MACT Determinations Under Section 112(J)) Requirements (EPA 453-R-02-

Inspection Protocol and Model Reporting Requirements for Stationary Sources (EPA 340-1-

- Potential to Emit for MACT Standards Guidance on Timing Issues (5/16/95)\*
- Policy on Timely and Appropriate Enforcement Response to HPV (12/98)\*
- · Unified Air Toxics Website, http://www.epa.qov/ttn/atw (\*Source: Greg Fried, 202-564-7016)

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#### Recommended Self-Study/Review (Volatile Organics - VOC's)

• Handbook: Control Techniques for Fugitive VOC Emissions from Chemical Process Facilities (EPA 625-R-93/005, 3/94)\*'

Handbook: Control Techniques for Hazardous Air Pollutants (EPA 625-6-91-014,6/91)\*
Environmental Regulations and Technology; Fugitive VOC Emissions in the Synthetic Organic Chemicals Manufacturing Industry (EPA 625-10-84-004,12/84)\*
Hazardous Organics NESHAP (HON) Inspection Tool (Volumes 1 & 2)\*
Process-Based Self-Assessment Tool for the Organic Chemical Industry (EPA 305-8-97-002, 4/97)\*

Inspection Manual: Federal Equipment Leak Regulations for the Chemical Manufacturing Industry: (3 Volume Set) (EPA 305-B-98-011, 12/98)\*

Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources, \* (\*Source: Greg Fried, 202-564-7016)

Recommended Self-Study/Review (Particulate Emissions)

• Centrol Techniques for Particulate Emissions from Stationary Sources: Volumes 1 & 2, September, 1982 (EPA-450-3-81-005) (Source: Greg Fried, 202-564-7016)

Recommended Self-Study/Review (Combustion Sources)

- Combustion Emissions Technical Resource Document (CETRED) (EPA 530-R-94-014, 5/94) (Source: Greg Fried, 202-564-7016)
- · Combustion Related Rules, http://www.epa.gov/ttn/atw/combustllist.html

Recommended Self-Study/Review (Environmental Information/Data)

- Applicability Determination Index (ADI), httQ://cfpub2.epa\_gov/adi/
- MACT Prioritization Tool, http://www.epa\_gov/idea/mact/

· AIRS Facility Subsystem (AFS),

http://www.epa.gov/Compliance/data/systems/air/afssystem.html

Signature

CAA

#### Memo

To: File

Re: Certification of Mandatory On-the-Job Training for Inspector Credentials

1. Francisco Claudio, certify that I have conducted two inspections, including inspection preparation procedures, at the following types of facilities with Steven Riva, DEPP NY Office back in 1985 before leading an inspection as required by the training requirements for Clean Air Act (CAA) Stationary Sources inspectors.

PR Cement-Ponce

Yahucoa Sun Oil-Yabucoa Refinery

Inspector's Signature

October 29, 2009

Date

I have reviewed the statement above and find that it meets the requirements for EPA Order 3500.1 program-specific training requirements for Clean Air Act (CAA) Stationary Sources inspectors. The inspector is approved to lead inspections.

Supervisor's Signature